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15 Plaintiffs' Interim Co-Lead Counsel

16 [*See Additional Counsel on Signature Page*]

17 **IN THE UNITED STATES DISTRICT COURT**  
18 **FOR THE DISTRICT OF ARIZONA**

19 James Paul Mooney; and Lazy Coyote RV  
20 Village, LLC, on behalf of themselves and  
21 all others similarly situated,

22 Plaintiffs,

23 v.

24 Union Pacific Railroad Company,  
25 successor to Southern Pacific  
26 Transportation Company; SFPP, L.P.  
27 (formerly known as Santa Fe Pacific  
28 Pipelines, Inc., formerly known as  
Southern Pacific Pipelines, Inc.); Kinder  
Morgan Operating L.P. "D"; and Kinder  
Morgan G.P., Inc.,

Defendants.

**CLASS ACTION**

LEAD CASE NO. 2:15-cv-01092-DGC  
(Consolidated with Case No. 2:15-cv-  
01380-DGC)

**PLAINTIFFS' NOTICE OF SERVICE  
OF DEPOSITION NOTICES**

Honorable David G. Campbell

1 Pursuant to LRCiv 5.2, Plaintiffs James Paul Mooney and Lazy Coyote RV  
2 Village, LLC (“Plaintiffs”), file this Notice of Service of Discovery Responses informing  
3 the Court that, on the 3rd day of November 2017, Plaintiffs served the following  
4 deposition notices upon Defendants Union Pacific Railroad Company (formerly known as  
5 Southern Pacific Transportation Company), SFPP, L.P. (formerly known as Santa Fe  
6 Pacific Pipelines, Inc. and Southern Pacific Pipelines, Inc.), Kinder Morgan Operating  
7 L.P. “D”, and Kinder Morgan G.P., Inc., through their counsel of record:

- 8 • Notice of Videotaped Deposition of Jeff Glasgow;
- 9 • Notice of Videotaped Deposition of Union Pacific Railroad Company  
10 Pursuant to Fed. R. Civ. P. 30(b)(6); and
- 11 • Notice of Videotaped Deposition of Kinder Morgan Defendants Pursuant to  
12 Fed. R. Civ. P. 30(b)(6)

1 Dated: November 3, 2017

Respectfully Submitted,

2 /s/ Barrett J. Vahle

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26 ***Additional Plaintiffs' Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 3, 2017, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system, which transmitted notice of the filing to all counsel of record.

/s/ Barrett J. Vahle

Barrett J. Vahle